Strengthening Families and Building a Community by Providing Affordable Housing

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December 6, 2011

ATTN: David Domingo
U.S. Environmental Protection Agency
NPDES Compliance Unit (OCE-133)
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

—AND—

ATTN: Todd Crutcher
Idaho Department of Environmental Quality
Boise Regional Office
1445 N. Orchard Street
Boise, Idaho 83706

RE: Information in the Matter of: Caldwell Housing Authority, Caldwell, Idaho—NPDES Permit Number ID-002545-3

Dear Gentlemen:

This letter is intended to satisfy the information requested in paragraphs 2 through 4, Enclosure B of the noncompliance notice dated November 17, 2011. The Caldwell Housing Authority (CHA) takes its responsibilities under the Clean Water Act very seriously. Because our main goal is provide public housing to low income individuals and families, we rely heavily on our contracted engineers and laboratory for guidance and direction. Lack of concise communication between us may account for the effluent limitation exceedances. However, we fully understand it is ultimately our responsibility to maintain compliance with our NPDES permit. Please consider:

Interrogative #1 (paragraph 2): Submit to EPA a detailed written explanation regarding the cause of the effluent limit exceedances specified in Enclosure A and steps taken or planned to reduce, eliminate, and prevent recurrence of these exceedances.

Response: After reviewing our records, we believe the Biochemical Oxygen Demand (BOD) exceedances in the Spring of 2007, 2009, 2010, and 2011 were caused by annual thermal-turnover, insufficient aeration, and overcharged cells that need dredged. The Total Suspended Solids (TSS) exceedances during the same time period were caused by algae growth during the summer months in the 3rd lagoon that is not aerated and sets idle before discharging into the contact chamber for chlorination. The Fecal coliform exceedances were caused by inoperable or malfunctioning equipment.

Short Term Steps: Over the next several weeks, CHA will take steps to provide better aeration to the lagoons and increase contact time to reduce BOD. Money permitting, CHA will remove the sludge from the 1st lagoon, allowing more solids to settle in the 1st lagoon before transferring to the 2nd lagoon. CHA will develop a process for treating the surface of the 3rd lagoon during the summer months to prevent excessive algae growth. As for the Fecal coliform, CHA will make sure all chemical feeding/metering equipment is working as intended and staff is adequately trained to replace or repair the equipment when necessary.

Long Term: As stated previously, CHA's primary focus is to provide affordable housing to low income persons and families. I anticipate there will be a time in the next couple of years when CHA no longer operates a wastewater facility; transferring all of its waste to the City of Caldwell for processing and treatment. To that end, CHA has hired a wastewater engineering firm to do a facility plan and Environmental Information Document (EID). The recommended alternative that has been approved by the CHA board is to connect with the City of Caldwell. Currently, CHA is working on the EID portion of the planning phase. CHA is currently in correspondence with IDEQ, USDA-RD and the Idaho Dept. of Commerce to obtain FY13 funding options for the recommended alternative. It is essential that CHA obtain grant/subsidies due to the rent requirements for low income housing. The City of Caldwell also supports this course of action.

Interrogative #2 (paragraph 3): Submit to EPA a schematic or engineering drawing and narrative description which clearly identifies the drain within the disinfection building and the location of where any wastewater with the drain flows.

Response: Attached (pages 4-6) are the engineering drawings that clearly identify the drain within the disinfection building and where liquids in the drain flow. As you can see by the drawings, the drain leaves the building and connects to the 8-inch PVC pipe that flows from the 3rd lagoon to the contact chamber for disinfection. Per our permit, CHA discharges at only one location and does not have any unauthorized waste streams into the Sebree Canal. Although we believe the drain to be adequately designed and built, we will await further clarification from the EPA and DEQ if the drain meets current standards.

Interrogative #3 (paragraph 4): Submit to EPA a schematic or engineering drawings and narrative description which clearly identifies the flow meter located north of lagoon #2 and all sources of flow measured by the meter and where the flow goes.

Response: There are no schematics or engineering drawings that identify the flow meter at the north end of lagoon #2. Wastewater from the lift station centrally located on CHA property is sent through the Parshall flume before it goes into a wet-well for dispersion to lagoon #1 or lagoon #2. There are no plans throughout the history of CHA's wastewater operations that show the use/requirement of a flow meter at the influent Parshall flume. Additionally, there are no requirements on our permit to monitor waste influent. Having said that, CHA learned the flow meter was installed by Pharmer Engineering in 2010 when conducting seepage testing, and was forgotten. Attached (page 7) is an excerpt from that seepage report.

I hope you find this response demonstrates a "good faith effort" on CHA's part to comply with the NPDES permit. If you find this response inadequate or can suggest a course of action more appropriate to adequately address your concern, please feel free to contact me as soon as possible.

Sincerely,

Mike Dittenber
Executive Director, CHA

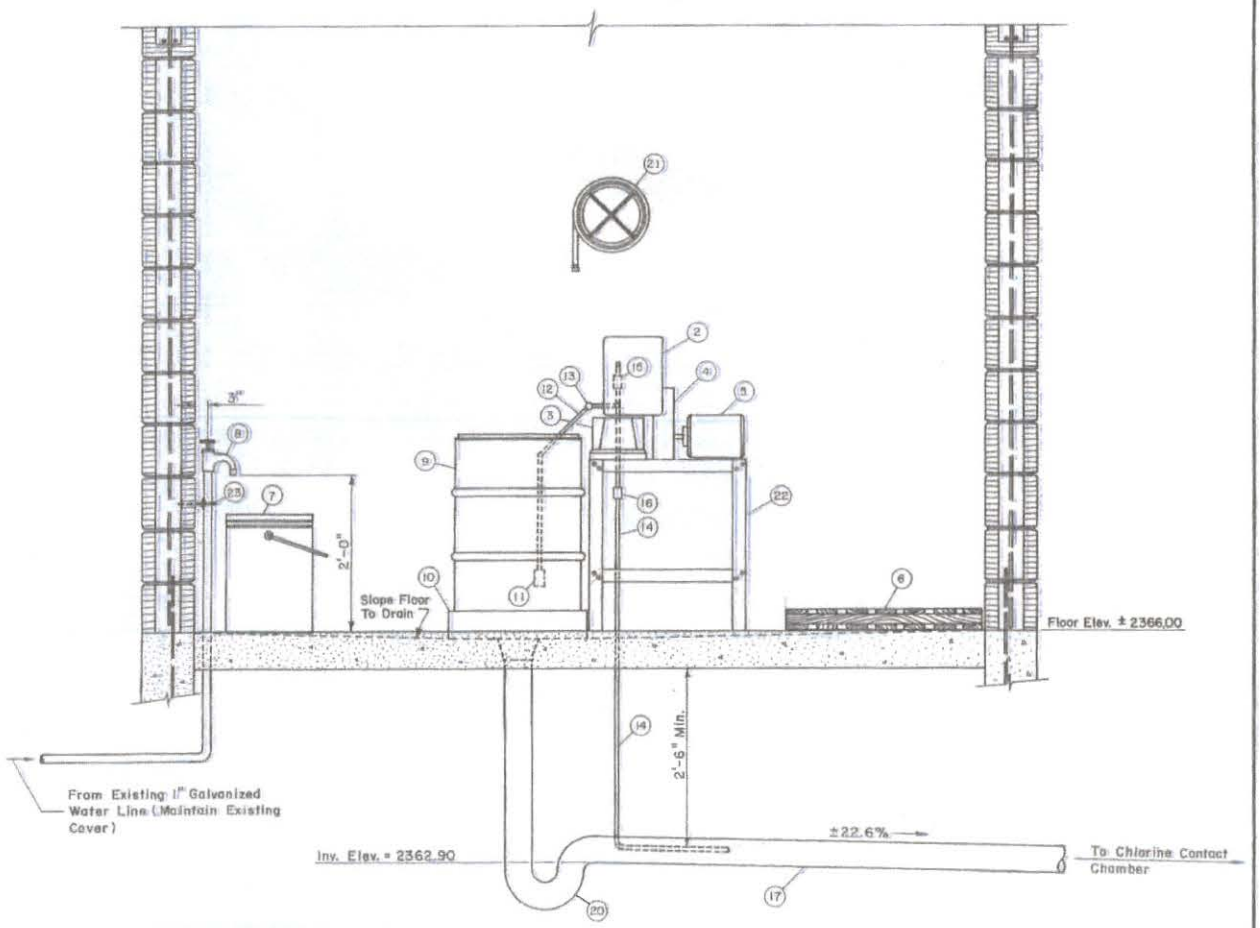
cc: Jesse Neilson
Pharmer Engineering

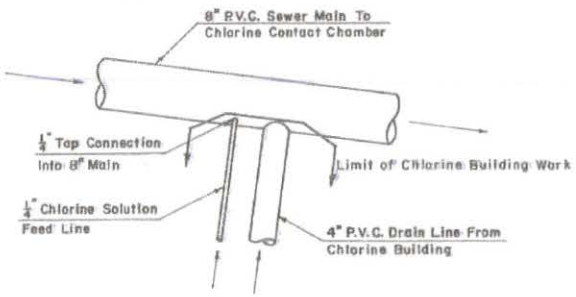
AJ Maupin
Idaho Department of Environmental Quality
State Office

Todd Crutcher
Idaho Department of Environmental Quality
Boise Office

Jennifer Wester
Idaho Department of Environmental Quality
Idaho Falls Office

SEWAGE IMPROVEMENT DETAILS
J-U-B ENGINEERS 1981
SHEET L7 and L10 (electronically manipulated for sizing)





SECTION A 7 7

NOTE
Excluding the suction and discharge tubing and their pump connections, all fittings called out as 1/4" may be supplied in a larger size with appropriate couplings upon approval of the engineer.

REGISTERED PROFESSIONAL ENGINEER 3121 STATE OF IDAHO DAVID L. CURTIS

CHLORINE SOLUTION FEED LINE
AND
CHLORINE BUILDING DRAIN LINE
CONNECTIONS INTO 8" P.V.C. SEWER MAIN
DETAIL "G"

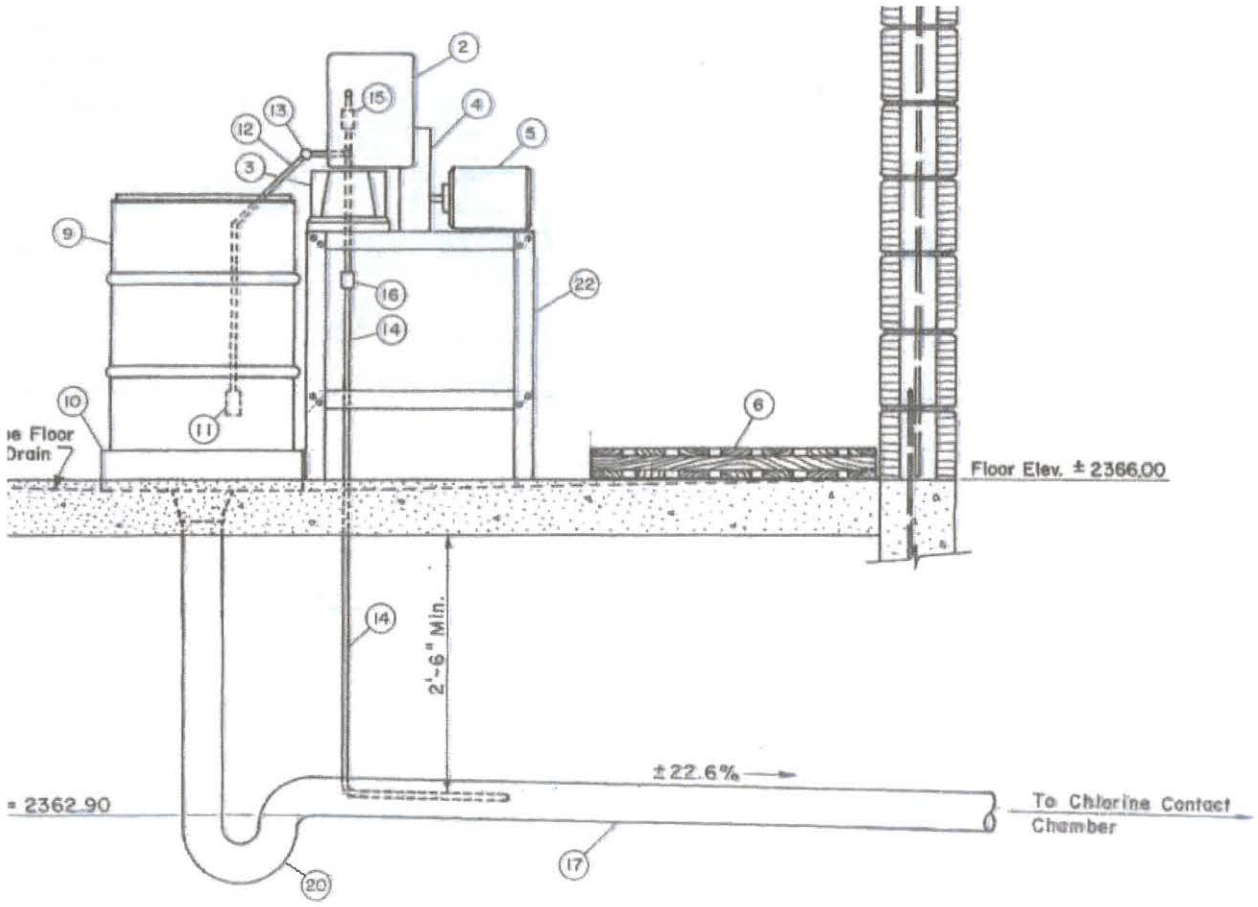
THE HOUSING AUTHORITY OF THE CITY OF CALDWELL
1981 RENOVATION PROJECT

SEWAGE LAGOON IMPROVEMENTS
CHLORINATION BUILDING MECHANICAL DETAILS

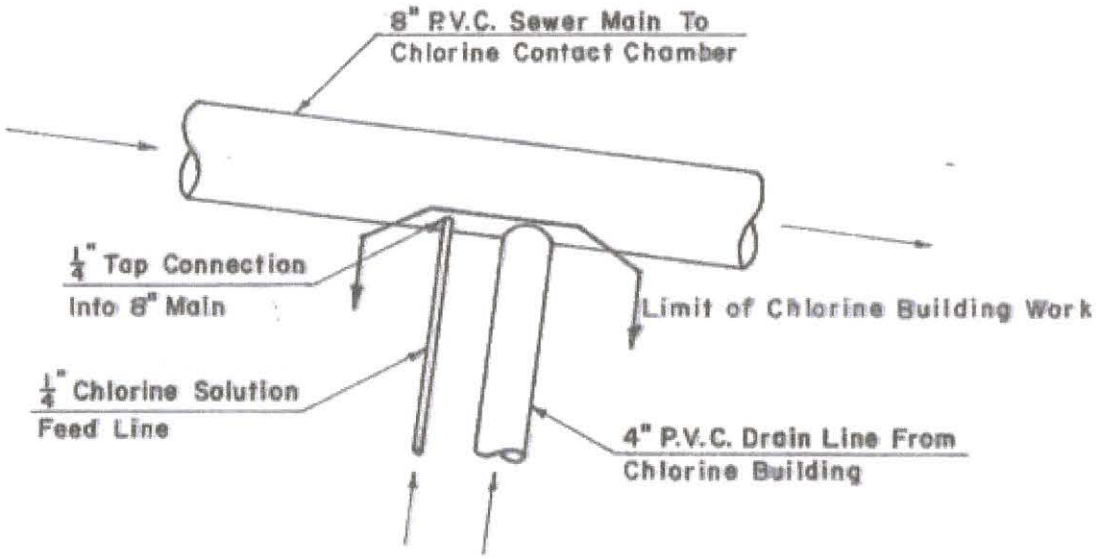
J-U-B ENGINEERS, INC.
Engineers Surveyors Planners
Nampa, Idaho

DES. DR. DLE CK. SHEET L 7 OF 33
SCALE 1" = 1'-0" DATE MAY, 1981 DWG. NO. N810507-07

SEWAGE IMPROVEMENT DETAILS
J-U-B ENGINEERS 1981
SHEET L7 (electronically manipulated for sizing)



SEWAGE IMPROVEMENT DETAILS
J-U-B ENGINEERS 1981
SHEET L10 (electronically manipulated for sizing)



CHLORINE SOLUTION FEED LINE
AND
CHLORINE BUILDING DRAIN LINE
CONNECTIONS INTO 8" P.V.C. SEWER MAIN
DETAIL "G"

SEEPAGE TESTING RESULTS
CALDWELL HOUSING AUTHOIRTY
COMPLETED BY PFARMER ENGINEERING
AUGUST 2010, PAGE 12

Figure 9: Influent Parshall flume with ultrasonic meter. Ultrasonic meter and data logger were added for Pond 2 test.